

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

**RYAN FARACE and
JOSEPH FARACE**

Defendants.

*
*
*
*
*
*
*

CRIMINAL NO. CCB-21-294

CONSENT MOTION TO EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT

Comes now the United States of America, by and through its counsel, Erek L. Barron, the United States Attorney for the District of Maryland, and Coreen Mao, Assistant United States Attorney for said district, and with the consent of counsel for Defendant Joseph Farace, respectfully submits this Consent Motion to Exclude Time Under the Speedy Trial Act.

1. On August 3, 2021, a one-count indictment was returned against the Defendants, Ryan Farace and Joseph Farace, for Conspiracy to Commit Money Laundering, in violation of 18 U.S.C. § 1956(h). ECF No. 1.

2. On October 8 (Ryan) and October 6 (Joseph), 2021, the Defendants had their initial appearances and Ryan Farace further entered a plea of not guilty. ECF Nos. 11, 17, 18. Subsequently, on September 8, 2022, Ryan Farace pled guilty to Count One of the Indictment. ECF No. 52. Defendant Ryan Farace's sentencing is set for November 30, 2022.

3. The most recent Speedy Trial Act motion filed with the Court on July 26, 2022 confirmed that voluminous discovery had been provided and sought the exclusion of time through September 8, 2022 for the parties to determine if the case could be resolved short of a trial. ECF No. 44. The Court approved the request for additional time and ordered that time through September 8, 2022 be excluded from computing the time in which the Defendants' trial shall

commence under the Speedy Trial Act. ECF No. 46.

4. The Speedy Trial Act provides that the trial of the defendant shall commence within seventy days “from the filing date (and making public) of the information or indictment, or from the date the defendant has appeared before a judicial officer of the court in which such charge is pending, whichever date occurs last.” 18 U.S.C. § 3161(c)(1). However, pursuant to 18 U.S.C. § 3161(h)(7)(A), any delay resulting from a continuance is excluded for speedy trial purposes if the continuance is based on a finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

5. The circumstances of this case require a continuance under the Speedy Trial Act. The parties are engaged in discussions on a potential pre-trial resolution, including a plea offer extended by the Government to Defendant Joseph Farace, which is under consideration. Under these circumstances, the ends of justice served by continuing the Speedy Trial Act clock outweigh the best interest of the public and the defendant in a speedy trial.

6. Counsel for Defendant Joseph Farace consents to this motion.

WHEREFORE, with the consent of counsel for Defendant Joseph Farace and pursuant to 18 U.S.C. § 3161(h)(7)(A), counsel for the Government requests that the Court exclude all time from September 9, 2022 through October 28, 2022, under the Speedy Trial Act.

Respectfully submitted,

Erek L. Barron
United States Attorney

/s/ _____
Coreen Mao
Assistant United States Attorney
United States Attorney’s Office
District of Maryland